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March 5, 2021

VIA ELECTRONIC FILING

The Honorable Jocelyn Boyd  
Chief Clerk/Executive Director  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, SC 29210

Re: Public Service Commission Review of South Carolina Code of Regulations  
Chapter 103 Pursuant to S.C. Code Ann. Section 1-23-120(J)  
Docket No. 2020-247-A

Dear Ms. Boyd:

I write this letter on behalf of Blue Granite Water Company (the "Blue Granite") in response to the request for comments regarding the Minimum Filing Requirements ("MFRs") in the referenced docket. Blue Granite agrees with the comments filed today by Charles Terreni for the SouthWest Water utilities that many of the draft proposed MFRs would be inappropriate for water and wastewater utilities, and that the Commission should separately consider whether new MFRs should be adopted for water and wastewater utilities, and what form those MFRs should take. Further, like Duke Energy Carolinas, LLC and Duke Energy Progress, LLC, Blue Granite also disagrees that utilities' rate case applications and their attendant schedules should be uniformly formatted, since the associated business records are more efficiently and appropriately kept in accordance with each utility's own business practices.

Thank you for your consideration of these comments.

Yours truly,

Frank R. Ellerbe, III

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cc: Parties of Record (via email)